

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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	:	
GERY SHALON,		
a/k/a "Garri Shalelashvili,"	:	
a/k/a "Gabriel,"		
a/k/a "Gabi,"	:	<b>GOVERNMENT'S FORFEITURE</b>
a/k/a "Phillipe Mousset,"		<b><u>BILL OF PARTICULARS</u></b>
a/k/a "Christopher Engeham,"	:	
		15 Cr. 333 (LTS)
JOSHUA SAMUEL AARON,	:	
a/k/a "Mike Shields," and		
	:	
ZIV ORENSTEIN,		
a/k/a "Aviv Stein,"	:	
a/k/a "John Avery,"		
	:	
Defendants.		
	:	
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Pursuant to United States v. Grammatikos, 633 F.2d 1013, 1024 (2d Cir. 1980), the Government respectfully gives notice that the property subject to forfeiture as a result of the offenses described in Counts One through Fourteen and Eighteen through Twenty-Three of the Superseding Indictment, as alleged in the Forfeiture Allegation and/or the Substitute Assets Provision in the Indictment, includes but is not limited to the following:

- i. Any and all funds in Account Number LU28 8067 1718 5147 4636, in the name of Leramo Consulting Limited at Ipay International SA, Luxembourg;
- ii. Any and all funds in Account Number CY94002001950000357019221321, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- iii. Any and all funds in Account Number CY44002001950000357019221348, in the name of Beewings Limited at Bank of Cyprus, Cyprus;
- iv. Any and all funds in Account Number CY72002001950000357005243241, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;

- v. Any and all funds in Account Number CY63002001950000357005243306, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vi. Any and all funds in Account Number CY50002001950000357007243001, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- vii. Any and all funds in Account Number CY30002001950000357008021398, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- viii. Any and all funds in Account Number CY27002001950000357008021355, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- ix. Any and all funds in Account Number CY61002001950000357009256038, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- x. Any and all funds in Account Number CY8002001950000357008021371, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- xi. Any and all funds in Account Number CY67002001950000357018889582, in the name of Jakuss Andris at Bank of Cyprus, Cyprus;
- xii. Any and all funds in Account Number CY05002001950000357003552670, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xiii. Any and all funds in Account Number CY40002001950000357003552719, in the name of Narrowserve Assets Ltd at Bank of Cyprus, Cyprus;
- xiv. Any and all funds in Account Number CY17002003850000004031710806, in the name of Onirama Investments Ltd at Bank of Cyprus, Cyprus;
- xv. Any and all funds in Account Number CY98002001950000357019220279, in the name of Ringo Enterprises Limited at Bank of Cyprus, Cyprus;
- xvi. Any and all funds in Account Number 357019220287, in the name of Ringo Enterprises Limited at Bank of Cyprus, Cyprus;

- xvii. Any and all funds in Account Number CY94002001950000357005246143, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xviii. Any and all funds in Account Number CY19002001950000357005246135, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xix. Any and all funds in Account Number CY41002001950000357003666870, in the name of Sorila Commercial Ltd at Bank of Cyprus, Cyprus;
- xx. Any and all funds in Account Number 0385-40-115928-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxi. Any and all funds in Account Number 0385-40-187697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxii. Any and all funds in Account Number 0385-40-197285-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiii. Any and all funds in Account Number 0385-40-216697-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxiv. Any and all funds in Account Number 0385-40-216700-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxv. Andand all funds in Account Number 0385-40-218290-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvi. Any and all funds in Account Number 0385-40-218304-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxvii. Any and all funds in Account Number 0385-40-218886-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxviii. Any and all funds in Account Number 0385-40-223510-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;

- xxix. Any and all funds in Account Number 0385-40-233737-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxx. Any and all funds in Account Number 0385-40-249706-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxi. Any and all funds in Account Number 0385-40-250534-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxii. Any and all funds in Account Number 0385-40-250542-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxiii. Any and all funds in Account Number 0385-42-113003-06, in the name of Telisium Ltd C/O Oxford Pocket at Bank of Cyprus, Cyprus;
- xxxiv. Any and all funds in Account Number 015501209020, in the name of Valentina Popova at Bank of Cyprus, Cyprus; and
- xxxv. Any and all funds in Account Number 015540898100, in the name of Valentina Popova at Bank of Cyprus, Cyprus;
- xxxvi. Any and all funds in Account Number GE13BS0000000074236163, in the name of Ideal Seeker Limited at Basis Bank, Georgia;
- xxxvii. Any and all funds in Account Number GE13BS0000000074236163, in the name of Ideal Seeker Limited at Basis Bank, Georgia; and
- xxxviii. Any and all funds in Account Number GE57BS0000000074236147, in the name of Innovative Garden Limited at Basis Bank, Georgia;
- xxxix. Any and all funds in Account Number GE65CR0000000019953612, in the name of Affare Limited at Cartu Bank, Georgia;
- xl. Any and all funds in Account Number GE44CR0000000019953602, in the name of Affare Limited at Cartu Bank, Georgia;

- xli. Any and all funds in Account Number GE10CR0000001957474506, in the name of Affare Limited at Cartu Bank, Georgia;
- xlvi. Any and all funds in Account Number GE95CR0000005021394516, in the name of Affare Limited at Cartu Bank, Georgia;
- xlvi. Any and all funds in Account Number GE79CR0000000014403602, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;
- xlii. Any and all funds in Account Number GE37CR0000002220224516, in the name of Ideal Seeker Limited at Cartu Bank, Georgia;
- xli. Any and all funds in Account Number GE89CR0000000014203602, in the name of Innovative Garden Limited at Cartu Bank, Georgia;
- xli. Any and all funds in Account Number GE45CR0000005021424516, in the name of Milos Menkovic at Cartu Bank, Georgia;
- xlii. Any and all funds in Account Number GE54CR0000005020274516, in the name of Realzone Trading Limited at Cartu Bank, Georgia;
- xlii. Any and all funds in Account Number GE55CR0000000018763602, in the name of Realzone Trading Limited at Cartu Bank, Georgia;
- xli. Any and all funds in Account Number GE76CR0000000018763612, in the name of Realzone Trading Limited at Cartu Bank, Georgia;
- 1. Any and all funds in Account Number GE93CR0000000019943602, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- li. Any and all funds in Account Number GE17CR0000000019943612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- lii. Any and all funds in Account Number GE59CR0000001957464506, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;

- liii. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- liv. Any and all funds in Account Number GE04CR0000007006864516, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- lv. Any and all funds in Account Number GE62CR0000000016133612, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- lvi. Any and all funds in Account Number GE41CR0000000016133602, in the name of Ringo Enterprises Limited at Cartu Bank, Georgia;
- lvii. Any and all funds in Account Number GE05CR0000005020284516, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
- lviii. Any and all funds in Account Number GE12CR0000000000803662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
- lix. Any and all funds in Account Number GE14CR0000000000763662, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
- lx. Any and all funds in Account Number GE73CR0000000019373602, in the name of Supertool Investments Limited at Cartu Bank, Georgia; and
- lxi. Any and all funds in Account Number GE94CR0000000019373612, in the name of Supertool Investments Limited at Cartu Bank, Georgia;
- lxii. Any and all funds in Account Number 240-07-457124-01, in the name of Entersa Limited at Hellenic Bank, Cyprus;
- lxiii. Any and all funds in Account Number 240-01-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;
- lxiv. Any and all funds in Account Number 240-07-439881-01, in the name of Erpefa Trading Limited at Hellenic Bank, Cyprus;
- lxv. Any and all funds in Account Number 240-01-402849-01, in the name of Ilforno Management Limited at Hellenic Bank, Cyprus;

- lxvi. Any and all funds in Account Number 240-01-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;
- lxvii. Any and all funds in Account Number 240-07-394182-01, in the name of Plantena Investments Limited at Hellenic Bank, Cyprus;
- lxviii. Any and all funds in Account Number 140-01-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxix. Any and all funds in Account Number 140-07-584400-01, in the name of Sunserve Equities Ltd at Hellenic Bank, Cyprus;
- lxx. Any and all funds in Account Number 240-07-398091-05, in the name of Telisium Limited at Hellenic Bank, Cyprus;
- lxxi. Any and all funds in Account Number 240-07-398091-06, in the name of Telisium Limited at Hellenic Bank, Cyprus; and
- lxxii. Any and all funds in Account Number 240-07-555002-01, in the name of Warmkal Trading Limited at Hellenic Bank, Cyprus;
- lxxiii. Any and all funds in Account Number LV43LAPB0000026063413, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxiv. Account Number LV16LAPB0000026063414, in the name of Filipko Konstyantyn at Pasta Bank, Latvia;
- lxxv. Any and all funds in Account Number LV35LAPB0000066058985, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia; and
- lxxvi. Any and all funds in Account Number LV53LAPB0000076052668, in the name of Katar Enterprises Inc. at Pasta Bank, Latvia;
- lxxvii. Any and all funds in Account Number 310.051.0010, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxviii. Any and all funds in Account Number 310.051.0002, in the name of Allvitone Systems LP at Schroder & Co Bank AG, Switzerland;
- lxxix. Any and all funds on deposit at Schroder & Co Bank AG, Switzerland in the name of Nener Finance Corp;
- lxxx. Any and all funds in Account Number 310.083.0002, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;

- lxxxi. Any and all funds in Account Number 310.083.0010, in the name of Terlinura Alliance LP at Schroder & Co Bank AG, Switzerland;
- lxxxii. \$299,900 in United States currency seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxiii. 767,000 in Israeli Shekels seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxiv. Black box containing Mont Blank pen seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxv. Black purse containing three (3) chains seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxvi. Pink box containing fifteen (15) earrings, bracelet, four (4) rings, and Escada button seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxvii. Red box containing gold chain and bracelet seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxviii. Red box containing gold chain seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- lxxxix. Blue box containing a Frank watch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xc. Two red boxes each containing pearl bracelet seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xc. Red box containing a pearl necklace seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcii. Red box containing a pearl necklace with pendant seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;



- xciii. Red box containing a chain and two (2) earrings seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xciv. Magnolia white box containing two (2) earrings, bracelet, ring, pendant, three (3) chains seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcv. Red box containing large gold chain flower seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcvi. Petek watch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcvii. Chopard wristwatch seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;
- xcviii. Red box containing a gold chain and three (3) bracelets seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel; and
- xcix. White MONTBLANC pen seized on July 21, 2015 by the Israel National Police Cyber Unit, Lahav 433 from the residence of Gery Shalon in Israel;

Dated: New York, New York  
April 20, 2017

Respectfully submitted,

JOON H. KIM  
Acting United States Attorney  
Southern District of New York

By: //s//  
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